



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd floor
New York, New York 10007

2/24/15
February 24, 2015

BY FACSIMILE

The Honorable Michael H. Dolinger
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Barone v. United States, et al.*, No. 12-cv-4103 (LAK) (MHD)

Dear Judge Dolinger:

This office represents Defendants the United States of America, Agent Michael Gaeta, Agent Gregorio Miceli, and Agent Michael Trombetta in the above-referenced action. We write respectfully to request a one-week extension of time to file Defendants' reply in support of their motion to dismiss the Amended Complaint and Defendants' opposition to Plaintiff's cross-motion to unseal grand jury materials, from February 24, 2015, to March 3, 2015. *See* Dkt. No. 65. The reason for Defendants' request is the temporary absence of the undersigned counsel due to the need to attend to a serious family illness. Because the extension of this deadline necessitates a corresponding one-week adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to unseal grand jury materials, which is currently March 6, 2015, we also respectfully request on behalf of Plaintiff that the Court so-order an adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to March 13, 2015.

The Court granted one previous request for an extension of these deadlines. *See* Dkt. No. 65. I have conferred with Plaintiff's counsel, who consents to this request.

ENDORSED
ORDER

Application granted.

By: *[Signature]*
2/24/15

Respectfully,
PREET BHARARA
United States Attorney

/s/ Rebecca S. Tinio
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FAX Cover Sheet

Date: February 24, 2015

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Re: Barone v. United States of America et al
12 cv 04103 (LAK) (MHD)

Text of enclosed endorsed order: "Application granted."

From: Magistrate Judge Michael H. Dolinger
United States District Court
Southern District of New York
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